

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTER DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAVON BROWN,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Cause No: 4:19-CR00304

**MOTION FOR BOND**

COMES NOW Defendant, Shavon Brown, by and through her attorney, and moves this Honorable Court to admit Defendant to bail and release the defendant on her own recognizance and states to the court as follows:

1. Defendant does not pose a threat to the community.
2. Defendant does not pose a threat to herself.
3. Defendant has been confined to the “workhouse” for an extensive period of time.
4. Defendant will adhere and conform to any conditions that the court requires.
5. That due to the present circumstances with the pandemic, housing in the “workhouse” for these allegations poses a greater risk to her safety and the safety of others than her release on bond.
6. The equities demand the granting of bond especially in light of the contents of the letter attached as an exhibit.
7. The President of the United States in a press conference on today’s date advised people not to gather in groups of more than 10.

WHEREFORE, for the above reasons defendant respectfully requests that this defendant be granted a reasonable bond under the circumstances.

Respectfully Submitted,  
BRADLEY S. DEDE, L.L.C.

By /s/ Bradley S. Dede

Bradley S. Dede, #36103  
Attorney for Defendant  
7710 Carondelet Ave. Ste. 105  
Clayton, Missouri 63105  
314-725-9700  
314-725-5967 (fax)  
[bsdede@att.net](mailto:bsdede@att.net)

Certificate of Service

The above signature certifies a copy of the foregoing was eFiled electronically with the Clerk of the Court this 16<sup>th</sup> day of March, 2020 to: United States Attorney's Office, 100 S. 10<sup>th</sup> Street, 20<sup>th</sup> Floor, St. Louis, MO 63102.